

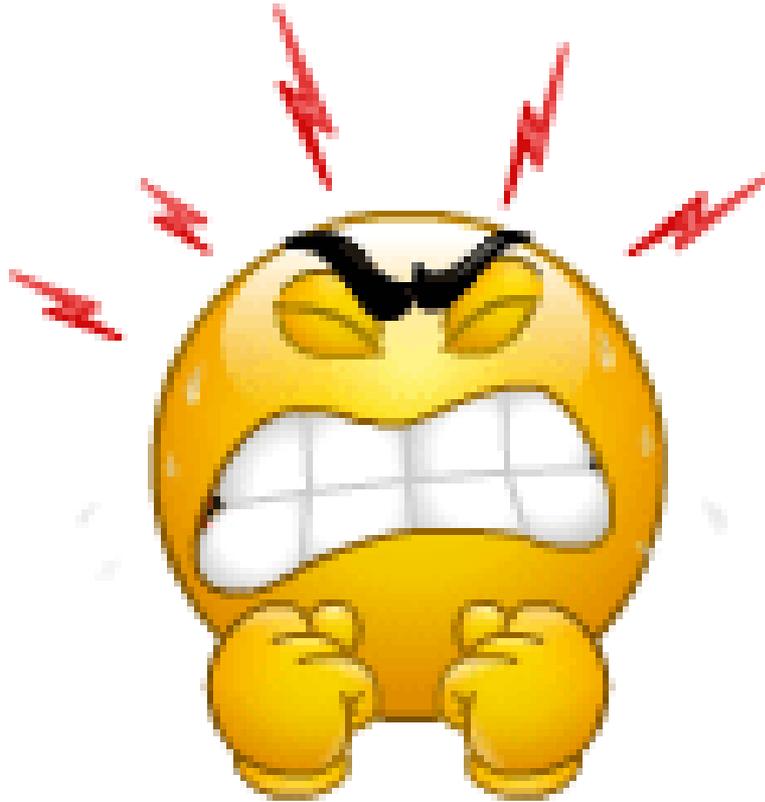


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DEPARTMENT OF
NATURAL RESOURCES

Operating Permits: Beyond the Forms

Tips and Tricks to Streamline
Operating Permit Applications

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Tips and Tricks Topics

- Incorporate by reference
- Flow diagrams
- Insignificant Activities
- Potential to Emit Calculations
- Submitting complex information



Incorporate by reference:

Available when renewing the same permit type,
Part 70 and Intermediates only

Ineffective way:

We would like to incorporate by reference our existing Part 70 Operating Permit.

Effective way:

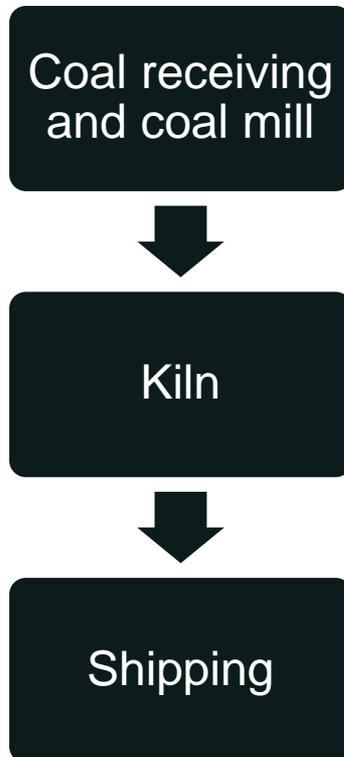
We would like to incorporate by reference our existing Part 70 Operating Permit with the following changes that are included in this application:

- Units that are subject to new rules (MACT 4Z, 6J, 6.261)
- Units that have been removed/installed/modified since previous Operating Permit

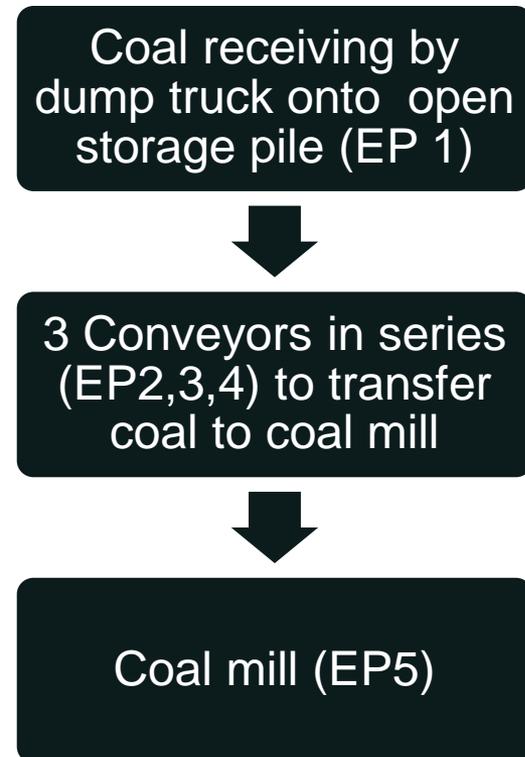


Flow Diagrams

Ineffective:



Effective:





Insignificant Activities:

Activities for which there is no applicable regulation

Ineffective ways:

Activity	Pollutant
Small Boiler	<15
Screening Plant	N/A
Gasoline Tank	
Burn Pit with ACD	
Tire shredder	None
Diesel tanks	
Space Heaters	

Effective way:

- Both Part 70 and Intermediates should include all activities
- There are very few activities that actually qualify as insignificant.
- Present the information in spreadsheets, with detailed explanations, source citations, etc.



Insignificant Activities:

Detailed activity explanations are crucial

Small boiler

- What is small? Fuel type(s), Year, MHDR?

Screening Plant

- Is this a single screen? What type? Materials, Year, MHDR?

Tire shredder

- Is this a tire cutter that slices a tire into five parts or does it shred tires into tiny pieces?

Space Heaters

- How many? Fuel type or electric? Year? MHDR?



Insignificant Activities:

Are they really insignificant?

Activity	Insignificant Activity?
Small Boiler	No. 6.220 applies, plantwide limits, other rules
Screening Plant	Maybe, case specific. Look at Subpart 000, 6.220, 6.400, 6.060, and plantwide limits
Gasoline Tank	No. MACT Subpart 6C applies, plantwide VOC/HAP limitations
Burn Pit with ACD	The burn pit itself is insignificant (need open burning permit to use it). The ACD requires a Part 70 (OSWI)
Tire shredder	Maybe, case specific. Look at 6.220, 6.060, 6.400
Diesel tanks	Maybe, case specific. Plantwide VOC/HAP limit, 5.500
Space Heaters	No. 6.220 applies to all, plantwide limits, other rules

Insignificant Activities:

Detailed emissions explanations are critical, especially for rule exemptions

Tire shredder (cuts tires into 5 slices per tire)

MHDR=0.02 ton tires/hour

(Source: 40 tires/day, 25 lbs/tire, 24 hours/day)

Emission factor=0.57 lb PM/ton tires

(Source: FIRE 6.21, no recent factor available)

$PTE=(0.02*0.57)=0.01$ lb PM/hr

Less than 0.5 lb/hr, meets exemption
6.400(1)(B)12.



Potential to Emit

Ineffective:

- Not including all emission points at the installation
- Providing vague values <15
- Not providing justification or citations for emission factors or derived MHDR
- Using performance testing results without providing documentation

Effective:

- The opposite of the left
- Named sources and fugitives
- Emergency generators may use 500 hours per year, all else uses 8760
- Submit a hardcopy with application, send spreadsheet to permit writer during review process
- Capture and control efficiencies for control devices



Photo credit:

<http://www.powderhandling.com.au/articles/the-practicalities-and-economics-of-dust-suppression>



Complex Information

1. Multiple types of the same unit
 - 20 diesel fired space heaters
2. Changing emission point numbers
3. Alternate operating scenarios
 - Multiple fuel or paint types
4. Complex regulatory applicability
 - Engines



40 CFR part 63 Subpart ZZZZ

Ineffective:

- EP-02 is subject to MACT 4Z

Effective:

- EP-02 is a diesel fired, non-emergency, 350 hp, CI, with displacement less than 30 L/cylinder, at an area source of HAPs, that was installed in January 2006 and is subject to 4Z as follows:
 - Existing unit , see 63.6590(a)(1)(iii)
 - Fuel requirements in 63.6604(a) and (b)

Summary

The Operating Permit forms are a tool, not a restriction.





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Questions?

Division of Environmental Quality Director: Leanne Tippett Mosby

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